IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,) CASE NO. 1:16-CR-0224
Plaintiff,) JUDGE PATRICIA A. GAUGHAN
-VS-)) UNNOPPOSED MOTION
BOGDAN NICOLESCU, TIBERIU DANET, and RADU MICLAUS,) TO CONTINUE SENTENCING) HEARING)
Defendants.)

Now comes the Defendant, Tiberiu Danet, by and through undersigned counsel, and respectfully requests that the sentencing hearing currently scheduled for February 20, 2009, be continued. Specifically, it is respectfully requested that the hearing be reset to a date following the conclusion of the jury trial that is set in this matter and which is currently scheduled to commence March 28, 2019. Counsel for the Defendant has informed counsel for the United States of America of the instant request and has confirmed that the request is unopposed.

Wherefore, the Defendant respectfully moves this Honorable Court to continue the sentencing hearing in this matter beyond the jury trial currently scheduled to commence March 28, 2019.

Respectfully s	submitted.
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/s/ Ronald L. Frey

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BARRY N. COVERT (NY Bar #2320117) Counsel for Defendant, Tiberiu Danet - pending Pro Hac Vice Admission LIPSITZ GREEN SCIME CAMBRIA, LLP 42 Delaware Ave., Suite 120 Buffalo, NY 14202 (716) 849-1333 bcovert@lglaw.com

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Unopposed Motion to Continue Sentencing Hearing has been served via ECF delivery this 9th day of January 2019, to Duncan Brown, Esq., Assistant United States Attorney, at Duncan.Brown@usdoj.gov, and to all parties indicated on the electronic filing receipt.

/s/ Ronald L. Frey_ RONALD L. FREY Counsel for Defendant Tiberiu Danet